

1 **SAO**

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13 *Attorneys for Plaintiff*

14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 EDDY CHINCHILLA, an Individual

17 Plaintiff,

18 vs.

19 BELLAGIO, LLC., et al as the employer; and  
20 CULINARY WORKERS UNION, LOCAL 226,

21 Defendants.

Case No.: 2:13-cv-01000-GMN-NJK

**STIPULATION AND ORDER TO EXTEND**

22 **STIPULATION AND ORDER TO EXTEND DEADLINE FOR PLAINTIFF'S RESPONSE TO**  
23 **DEFENDANT'S MOTION TO DISMISS**  
24 **(SECOND REQUEST)**

25 Plaintiff, EDDY CHINCHILLA, by and through his counsel of record, KANG & ASSOCIATES, and Defendant Bellagio, LLC., through its counsel of record, KAMER ZUCKER ABBOTT, and Co-Defendant Culinary Workers' Union through its counsel of record MCCRAKEN, STEMERMAN & HOLSBERRY hereby stipulate and agree as follows:

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1 Defendant's Culinary Workers' Union, Local 226, and Bellagio LLC., filed separate  
 2 Motions to Dismiss on March 5, 2014 and March 6, 2014, respectively. Motions were served to  
 3 Plaintiff's counsel on those dates.

4 IT IS HEREBY STIPULATED that Plaintiff is granted an extension of two additional  
 5 weeks in which to file responses to each Defendant's Motion to Dismiss up to and including the  
 6 date of Friday April 11, 2014.

7 SO STIPULATED.

8 DATED this \_\_28\_\_ day of March, 2014.

DATED this \_\_28\_\_ day of March, 2014.

9 KANG & ASSOCIATES, PLLC

KAMER ZUCKER ABBOTT

11 /s/ Kyle R. Tatum  
 12 KYLE R. TATUM, ESQ.  
 13 Nevada Bar No.: 13264  
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/s/ Edwin A. Keller  
 EDWIN A. KELLER, JR., ESQ.  
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 Las Vegas, Nevada 89102

14 *Attorneys for Plaintiff*

*Attorneys for Defendant Bellagio, LLC.*

16 DATED this \_\_28\_\_ day of March, 2014.

17 McCRACKEN, STEMERMAN & HOLSBERRY


19 /s/ Kristin L. Martin  
 20 KRISTIN L. MARTIN, ESQ.  
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 Las Vegas, Nevada 89102

22 *Attorneys for Defendant Culinary*  
 23 *Workers Union, Local 226*

**ORDER**

Pursuant to the stipulation, the foregoing is approved and **IT IS SO ORDERED.**

**DATED** this 28th day of March, 2014.



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Gloria M. Navarro, Chief Judge  
United States District Court

Respectfully Submitted by,  
**KANG & ASSOCIATES, PLLC.**

/s/ Kyle R. Tatum  
**KYLE R. TATUM, ESQ.**  
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